IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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UNITED STATES OF AMERICA : CRIMINAL NO. 07-____

:

v. : DATE FILED:

:

RONNIE SCUTCHING, : VIOLATION:

a/k/a RONNIE SANDERSON : 18 U.S.C. § 641 (conversion of government

funds) – 1 count

:

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

- 1. The Social Security Administration (SSA), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (SSI) program, pursuant to Title 42, United States Code, Sections 1381-1383f.
- 2. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, or who were "disabled," and who demonstrated financial need, as determined by their "income" and "resources," as those terms were defined for purposes of the Social Security Act. In addition, if an individual was married or lived with other people, the income and resources of the individual's spouse or other people with whom he or she lived were considered in determining the individual's financial eligibility for SSI.

- 3. The SSA's ability to determine properly whether an individual satisfied the medical and financial criteria to receive SSI directly depended upon the individual's providing the SSA with accurate medical and financial information. Likewise, the SSA's ability to determine properly whether an SSI recipient continued to be eligible to receive SSI, and the correct monthly benefit amount, directly depended upon the individual's providing the SSA with accurate and current medical and financial information.
- 4. The SSA used and relied upon the information that individuals self-reported regarding their medical condition and financial circumstances to determine eligibility for SSI, and to compute the proper SSI benefit amount.
- 5. In or about July 1978, defendant RONNIE SCUTCHING fraudulently applied to the SSA for a Social Security Number (SSN), using the false name RONNIE SANDERSON. The SSA issued SSN, xxx-xx-9877, to the fictitious SANDERSON.
- 6. On or about June 7, 1993, defendant RONNIE SCUTCHING, using the false name RONNIE SANDERSON and the fraudulently obtained SSN: xxx-xx-9877, filed an application for SSI, in which he claimed that he was disabled as of September 29, 1989.
- 7. In defendant RONNIE SCUTCHING's application for SSI benefits, he acknowledged that he understood "that anyone who knowingly lies or misrepresents the truth . . . is committing a crime."
- 8. In defendant RONNIE SCUTCHING's application for SSI benefits, among other things, he knowingly and falsely stated that (a) his name was RONNIE SANDERSON, when he knew his name was SCUTCHING; (b) his date of birth was August 7, 1958, when he knew his date of birth was August 5, 1958; (c) he never used any other name, when he knew he also used the name SCUTCHING; (d) he never used any SSN other than

xxx-xx-9877, when he knew he also used SSN: xxx-xx-2205, that is, the SSN assigned to SCUTCHING; (e) he was not and had never been married, when he knew he had been married since in or about April 1978; and (f) but for public welfare, he received no type of income, specifically including Social Security benefits, when he knew that he did receive other income, including Social Security disability insurance benefits that he received under his true name and SSN.

- 9. In or about December 1993, the SSA determined that defendant RONNIE SCUTCHING was medically and financially eligible to receive SSI with a date of entitlement as of June 1993, and the SSA made monthly SSI benefit payments to defendant SCUTCHING thereafter until approximately November 2004.
- 10. Defendant RONNIE SCUTCHING knowingly made false statements to the SSA regarding his identity, SSN, marital status, and income, thereby causing the SSA to improperly pay defendant SCUTCHING approximately \$63,966 in SSI payments, which defendant SCUTCHING knew he was not entitled to receive.
- 11. Beginning in or about June 1993 and continuing through in or about November 2004, in the Eastern District of Pennsylvania, defendant

RONNIE SCUTCHING, a/k/a RONNIE SANDERSON

knowingly converted to his own use money of the United States in excess of \$1,000, that is,

approximately \$63,966 in Social Security disability benefits, which defendant RONNIE SCUTCHING, a/k/a RONNIE SANDERSON knew he was not entitled to receive.

In violation of Title 18, United States Code, Section 641.

PATRICK L. MEEHAN UNITED STATES ATTORNEY